

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

JEMIMA MONYENYE BOSIRE,)	
minor son JOHN BOSIRE, and)	
BERNARD BOSIRE, husband, father)	
Plaintiffs,)	CIVIL ACTION
)	FILE NO. 1:14-CV-02604
v.)	
THE KROGER COMPANY, and)	
)	Jury Trial Demanded
Defendant)	
_____)	

**PLAINTIFFS' SUPPLEMENTAL DISCLOSURE OF EXPERT
WITNESSES PURSUANT TO FED. R. CIV. P. 26(A)(2)**

Pursuant to Federal Rules of Civil Procedure, Rule 26, Plaintiffs hereby supplement the previously disclosed experts to add the report of Russell Kendzior:

Retained Experts:

1. Russell J. Kendzior of Traction Experts, Inc., PO Box 92628, Southlake, TX 76092 telephone (817) 749-1705, safety@verizon.net. Resume, List of Prior Testimony, and Fee Schedule provided; report attached.

Non-Retained, Treating Experts

1. David A. Williams, MD. Dr. Williams will testify as a treating physician regarding the issues raised by the medical care he provided to Plaintiff Jemima Monyenye Bosire, the medication he prescribed, and his diagnosis regarding Mrs. Monyenye Bosire's physical condition subsequent to her injury at Kroger and the treatment he provided her. Dr. Williams' records have been provided to the defense. The doctor will also discuss what medical complaints Mrs. Monyenye Bosire made to medical staff in the

weeks and months following the incident and whether he believes there was a causal connection between the fall down and any medical complaint. The doctor is expected to find causal connection. Dr. Williams's address is: The Wellness Center, 2799 Delk Rd. SE Suite #100, Marietta, GA 30067 (770) 955-2046.

2. Dr. Rick Emery, DC. Dr. Emery will testify as a treating chiropractor, and will offer testimony regarding the issues raised by the chiropractic care he provided to Plaintiff Jemima Monyenye Bosire, and the condition she was in on September 3, 2013 when Mrs. Bosire first reported to Marietta Spine and Injury Center / Emery Chiropractic Clinic following her fall down at Kroger and her complaints and condition when Mrs. Bosire again saw Dr. Emery on the following dates: September 4; September 5; September 9; September 11; September 13; September 16; September 17; September 19; September 24; September 26; September 30; October 7; October 11; October 14; October 21; October 25; November 1; November 4; November 11; November 18; November 25; December 3; December 9; December 17; December 30 and December 31, 2013. Dr. Emery's records have been provided to the defense. The doctor will also discuss what medical complaints Mrs. Monyenye Bosire made to medical staff in the weeks and months following the incident and whether he believes there was a causal connection between the fall down and any medical complaint. The doctor is expected to find causal connection. Dr. Emery's address is Marietta Spine and Injury Center / Emery Chiropractic Clinic, 1469 Roswell Road, Marietta, GA 30062. 770 509 2433
3. Dr. Daniel Moore, MD, FACS. Dr. Moore will testify as a treating physician regarding the issues raised by the medical care he provided to Plaintiff Jemima Monyenye Bosire following her fall down at Kroger, the medication he prescribed, and his diagnosis regarding Mrs. Monyenye Bosire's physical

condition subsequent to her injury at Kroger and the treatment he provided her. Dr. Moore for dates of treatment on October 8, 2013, November 19, 2013, January 8, 2014. January 10, 2014. January 23, 2014. February 20, 2014. March 26, 2014. April 10, 2014. June 25, 2014. Dr. Moore's records have been provided to the defense. The doctor will also discuss what medical complaints Mrs. Monyenye Bosire made to medical staff in the weeks and months following the incident and whether he believes there was a causal connection between the fall down and any medical complaint. The doctor is expected to find causal connection. Dr. Moore's address is: Craniospinal Institute of Georgia, 790 Church Street, Marietta, GA 30060, 770 424 2025

4. Dr. Eric Solomon, MD. Dr. Solomon will testify as a treating physician regarding the issues raised by the medical care he provided to Plaintiff Jemima Monyenye Bosire, the medication he prescribed, and his diagnosis regarding Mrs. Monyenye Bosire's physical condition subsequent to her injury at Kroger and the treatment he provided her including prescriptions for Nabumetone, 500mg, Neurontin, 300mg, Lidocaine, Ultram, Skelaxin 800mg, Motrin ID 200mg. Dr. Solomon's records have been provided to the defense. The doctor will also discuss what medical complaints Mrs. Monyenye Bosire made to medical staff in the weeks and months following the incident and whether he believes there was a causal connection between the fall down and any medical complaint. The doctor is expected to find causal connection. Dr. Solomon's address is: Chronic Pain Clinics of America, LLC, 1395 S Marietta Pkwy, SE bldg. 100 Ste 102, Marietta, GA 30067-7852. 770 425 8700
5. Dr. David Gale, MD. Dr. Gale will testify as a treating physician regarding the issues raised by the medical care he provided to Plaintiff Jemima Monyenye Bosire, the medication he prescribed, and his diagnosis regarding

Mrs. Monyenye Bosire's physical condition subsequent to her injury at Kroger and the treatment he provided her. Dr. Gale's records have been provided to the defense. The doctor will also discuss what medical complaints Mrs. Monyenye Bosire made to medical staff in the weeks and months following the incident and whether he believes there was a causal connection between the fall down and any medical complaint. The doctor is expected to find causal connection. Dr. Gale's address is: Pain Solutions, 400 Tower Road, Suite 350, Marietta, GA 30060 (770) 590 1078.

This 13 day of January, 2016.

JEFFREY/SCOTT, LLP

/s/Jeffrey Gewirtz
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CERTIFICATE OF SERVICE AND COMPLIANCE WITH L.R. 7.1D

I hereby certify that I electronically filed **PLAINTIFFS RULE 26 EXPERT SUPPLEMENTAL DISCLOSURES** with the Clerk of Court using this Court's CM/ECF system which will automatically send email notification of such filing to the following attorneys of record, and served all counsel of record with a copy of the entire pleading addressed as follows:

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Pursuant to Northern District of Georgia Local Rule 7.1D, the undersigned counsel hereby certifies that the above and foregoing is a computer document prepared in Times New Roman (14 point) font in accordance with Local Rule 5.1B.

This 13th day of January, 2016.

Respectfully submitted,

JEFFREY/SCOTT, LLP

/s/Jeffrey Gewirtz

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